



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

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Philadelphia, Pennsylvania 19107

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AUG 16 1988

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Albert C. Gray Ph. D., P.E.  
JACA Corporation  
550 Pinetown Road  
Fort Washington, PA 19034

Dear Dr. Gray:

I am in receipt of JACA's 8/11/88 SAP resubmittal for the Cryochem NPL Site. This document has been resubmitted to reflect EPA comments forwarded to JACA 7/12/88, and discussed during a conference call on July 22, 1988. The July 22, 1988 conference call included EPA, EPA's oversight contractor (PRC), and JACA.

Upon review of the 8/11/88 SAP resubmittal the first issue I'd like to discuss concerns the project schedule. A revised RI/FS schedule was submitted with the 8/11/88 SAP which is time-specific for sampling events. When compared with the schedule in the Scope of Work (SOW), however, it appears that the two schedules are not consistent with each other. For example, according to the SAP schedule, four weeks from the date of Phase I approval, soil/gas work will begin. If I am calculating correctly, that takes us to week 19 of the SOW schedule. According to the SOW schedule however, all Phase I work, of which soil/gas is a part, is scheduled to be completed by week 17. It is also noted that certain Phase I activities do not appear in the SAP schedule, e.g. walkthrough by field biologist.

Please revise the SAP and SOW schedules so that they are consistent and include all activities. I recommend that the revised schedule reflect the conditions of Phase I approval set forth later in this letter, as well as impending vacation schedules.

EPA is prepared to approve Phase I activities set forth in the 8/11/88 SAP conditioned on the following:

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- Residential well samples are not to be collected until the QAPP for the project has been submitted and approved by EPA;
- Phase 1 is to include a wetlands delineation for the Cryochem site. The SAP at Section 2.2.1 is to be changed to include an onsite wetlands delineation. Section 3 of the SAP is to contain narrative concerning the onsite wetlands delineation as well as narrative concerning how JACA will not disturb offsite wetlands during field work. The foregoing was discussed and agreed to during our 7/22/88 conference call as I recall.
- Figures 3-5, 3-6, 3-7, 3-8, and 3-10 are to be resubmitted. Those contained in the 8/11/88 submission are EPA and/or Government Forms concerning chain of custody which are not available for your use.
- EPA assumes that the February 1988 study by JACA may be utilized in proposing sites for soil/gas work. If so, when submitting the proposed sites for soil/gas work as outlined in Section 3.2.2 of the 8/10/88 SAP, include a copy of the February 1988 study. It is noted that additional information concerning "at least eight possible contributors" was requested during the 7/22/88 conference call and expected to be included in the revised SAP. Specific information regarding the alleged contributors has not been included in the revised SAP although the SAP references the February 1988 JACA study.
- Revision of the SOW and SAP schedules so that they are consistent with each other.

With respect to Phase II activities set forth in the 8/11/88 SAP, as was outlined in EPA's letter of July 12, 1988, Phase II approval will not be given until the completion of Phase I activities and Phase II planning which is dependent on Phase I results. Revisions including, but not necessarily limited to, the following will be required for Phase II prior to approval by EPA:

- Per the consent order "JACA may perform one (1) well installation via bedrock boring instead of five (5), as long as borehole geophysics is utilized for all five (5) wells. The location of the one (1) well installed

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via bedrock coring shall be determined by EPA's Project Coordinator. The borehole geophysics shall include temperature logs, caliper logs and at least (1) of the following: gamma-gamma logs, resistivity logs, conductivity logs, or acoustic televiwer logs. Per EPA's July 12, 1988 comment package, borehole geophysics must be conducted during Phase II of the RI and the suite of borehole techniques must be finalized. Please revise Section 2.2.2 Phase II page 8 as well as Section 3.8.2 page 38, accordingly.

- Section 3.7.3, page 37, number 10, is to be revised to reflect that water will be tested and after consultation with EPA, be disposed in an approved manner.
- Figure 3-2 and 3-3 concerning summary specifications for screened bedrock monitor well and shallow monitor well construction, please be advised that the setting shall be 3' above seasonal high water elevation to insure that PVC is not in contact with ground water.

The revisions to the 8/11/88 SAP required by EPA and setforth in this correspondence, can be submitted as Addendum to the SAP. I envision that specific pages submitted in the Addendum will simply replace pages in the 8/11/88 SAP.

Finally, I will be on vacation from August 18 thru September 6. Should you have any questions during this period please contact Mr. Gregg Crystall, 215-597-8177. After this time I can be contacted at 215-597-3169. Thank you for your cooperation in this matter.

Sincerely,

*Christopher B. Pilla*  
Christopher B. Pilla  
Environmental Scientist

cc: B. Nishitani, EPA

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